

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CATHERINE V. SIKORSKI and JOHN SIKORSKI,

Docket No. 07 Civ. 3906
(CLB) (LMS)

Plaintiffs,

RULE 26 DISCLOSURE

- against -

FULTON CHEVROLET-CADILLAC CO., INC.,
FULTON CHEVROLET CO., INC., HIGH POINT
CHEVROLET, INC., FULTON/HIGH POINT
CHEVROLET GROUP HEALTH BENEFIT
PROGRAM, SIEBA, LTD., and JOHN DOES
"1" through "3", Whose Identities are Currently
Unknown,

Defendants.
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Defendant, Sieba, Ltd., by its attorneys, L'Abbate, Balkan, Colavita & Contini, L.L.P., as
and for its disclosure required by Fed.R.Civ.P. 26, set forth the following:

1. The following individuals are likely to have discoverable information which
defendants may use to support their claims:

John A. Worts
President
Fulton HighPoint Chevrolet
P.O. Box 519
Middletown, New York 10940-0519

Lori Pritchard
HR Manager
Fulton HighPoint Chevrolet
P.O. Box 519
Middletown, New York 10940-0519

Kenneth R. Hutchings
Broker/Consultant

The Anchor Group
131 East Ames Court
Plainview, New York 11803

Richard DoBell
President
Sieba, Ltd.
P.O. Box 5000
111 Grant Avenue, Suite 100
Endicott, New York 13761-5000

Diana DoBell
c/o Sieba, Ltd.
P.O. Box 5000
111 Grant Avenue, Suite 100
Endicott, New York 13761-5000

Karen Baxendale
Client Services
Sieba, Ltd.
P.O. Box 5000
111 Grant Avenue, Suite 100
Endicott, New York 13761-5000

Kate Rogers
Director of Claims Management
Sieba, Ltd.
P.O. Box 5000
111 Grant Avenue, Suite 100
Endicott, New York 13761-5000

Mary Anne DeWitt
Sieba Internal Auditor
P.O. Box 5000
111 Grant Avenue, Suite 100
Endicott, New York 13761-5000

Suzi Johnson
Avenco Insurance Company
Three Town Park Commons
225 Town Park Drive, Suite 145
Kennesaw, Georgia 30144

LeAnn M. Mischal
Capitol Special Risks
1899 Powers Ferry Road, Suite 100
Atlanta, Georgia 30339

Todd Partain
Capitol Special Risks
1899 Powers Ferry Road, Suite 100
Atlanta, Georgia 30339

Debra M. Lightner
Horizon Blue Cross/Blue Shield of New Jersey
3 Penn Plaza East, Suite 16F
Newark, New Jersey 07105

Wanda D. Green
Manager, Hey Accounts Service Unit
Multiplan
115 5th Avenue
New York, New York 10003

2. The following documents upon which defendants may rely at trial are enclosed
herewith:

- (a) Correspondence between parties and counsel;
- (b) Correspondence between parties and the New Jersey Department of Banking and Insurance;
- (c) Claims file documents;
- (d) Documents regarding Plaintiff's medical care;
- (e) Plaintiff's medical bills;
- (f) Third Party Administration Service Agreement;
- (g) Fulton/HighPoint Chevrolet Employee Healthplan Booklet; and
- (h) Summary of Outstanding/Unpaid Balances.

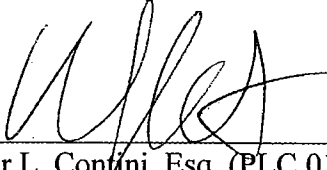
(3) The defendants are being defended in this action pursuant to the terms of a liability insurance policy issued by Great American Custom under policy No. TER 558-11-91. The policy provided coverage to Sieba Ltd., with Professional Liability Coverage limits of \$1,000,000 in excess of a \$25,000 Self-Insured Retention. The policy provided coverage for claims first made against the Insured during the policy, reported to the carrier within the policy period, and related to a wrongful act that took place on or after the Retroactive Date of October 1, 1999.

Dated: Garden City, New York
October 8, 2007

Respectfully submitted,

L'Abbate, Balkan, Colavita & Contini, L.L.P.

By:



Peter L. Contini, Esq. (PLC 0169)
Attorneys for Defendants
Sieba, Ltd.
1001 Franklin Avenue, Third Floor
Garden City, New York 11530
(516) 294-8844

TO: Jeffrey S.E. Sculley, Esq.
RIDER, WEINER & FRANKEL, P.C.
Attorneys for Plaintiff
655 Little Britain Road
New Windsor, New York 12553
(845) 562-9100

Richard Golden, Esq.
BURKE, MIELE & GOLDEN, LLP
Attorneys for Defendants
Fulton Chevrolet-Cadillac Co., Inc.,
Fulton Chevrolet Co., Inc.,
Highpoint Chevrolet, Inc. and
Fulton/High Point Chevrolet
Group Health Benefit Program
30 Matthews Street, Suite 303A
P. O. Box 216
Goshen, New York 10924
(845) 294-4080

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) SS.:
COUNTY OF NASSAU)

KAREN R. LUCERO, being duly sworn, deposes and says that deponent is not a party to the action, is over 18 years of age and resides at Nassau County, New York.

That on the 8th day of October, 2007, deponent served the within **RULE 26 DISCLOSURE** upon:

Jeffrey S.E. Sculley, Esq.
RIDER, WEINER & FRANKEL, P.C.
Attorneys for Plaintiff
655 Little Britain Road
New Windsor, New York 12553
(845) 562-9100

Richard Golden, Esq.
BURKE, MIELE & GOLDEN, LLP
Attorneys for Defendants
Fulton Chevrolet-Cadillac Co., Inc.,
Fulton Chevrolet Co., Inc.,
Highpoint Chevrolet, Inc. and
Fulton/High Point Chevrolet
Group Health Benefit Program
30 Matthews Street, Suite 303A
P. O. Box 216
Goshen, New York 10924
(845) 294-4080

the attorney(s) for the respective parties in this action, at the above address(es) designated by said attorney(s) for that purpose by depositing same enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.


KAREN R. LUCERO

Sworn to before me this 8th day of
October, 2007.



Notary Public

PETER L. CONTINI
Notary Public, State of New York
No. 4637417
Qualified in Suffolk County
Commission Expires July 31, 2015

PETER L. CONTINI
Notary Public, State of New York
No. 4637417
Qualified in Suffolk County
Commission Expires July 31, 2015